

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STARR INDEMNITY & LIABILITY COMPANY,

Plaintiff,

vs.

BRIGHTSTAR CORP. *et al.*,

Defendants.

13 Civ. 8580 (GWG)

**PLAINTIFF'S NOTICE OF MOTION
TO SEAL DOCUMENTS**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law in support of this motion, the accompanying Declaration of William Lang in Support of Plaintiff's Motion to Seal Documents executed on May 30, 2019, and the accompanying Declaration of Kevin J.B. O'Malley in Support of Plaintiff's Motion to Seal Documents executed on May 31, 2019 and the exhibits thereto, Plaintiff Starr Indemnity & Liability Company will move this Court, before the Honorable Gabriel W. Gorenstein, United States Magistrate Judge, United States Court House, 500 Pearl Street, Courtroom 6B, New York, New York, as soon as counsel may be heard, for an order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and the Court's inherent power ordering that the following portions of two documents that were filed under seal by Defendants Brightstar Corp. and Brightstar Germany GmbH may remain under seal: (1) portions of Exhibit 9 to the Declaration of Charles P. Edwards, Esq. in Support of Brightstar's Notice of Motion for Partial Summary Judgment executed on May 25, 2018 (ECF Doc. 134); and (2) portions of Exhibit 9 that appear and are quoted on page 23 of Brightstar's Reply in Support of Motion for Partial Summary dated July 24, 2018 (ECF Doc. 148), and granting such other and further relief as the Court deems just and proper under the circumstances.

Dated: New York, New York
May 31, 2019

NICOLETTI HORNIG & SWEENEY
Attorneys for Plaintiff

By: S/ John A.V. Nicoletti
John A.V. Nicoletti
Nooshin Namazi
Kevin J.B. O'Malley
Wall Street Plaza
88 Pine Street, Seventh Floor
New York, New York 10005
(212) 220-3830
jnicoletti@nicolettihornig.com
nnamazi@nicolettihornig.com
komalley@nicolettihornig.com